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Attachments: Final Comment on Proposed Water Conservation Plan.docx

Please find the attached comments on the 20x2020 Water Conservation Plan from Mojave Water Agency.

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<<http://www.facebook.com/pages/Apple-Valley-CA/Mojave-Water-Agency/44062812977?ref=ts%20-%2058k>>

COMMENTS ON 20X2020 WATER CONSERVATION PLAN

Mojave Water Agency (MWA) recognizes that aggressive steps are necessary to meet 20% urban water use reduction targets and has been working region-wide to radically transform water use habits as a cultural norm. Over the last decade, our agency has been actively and cooperatively pursuing ways to work with all of our stakeholders to reduce water use throughout our 4,900 square mile service area. We look forward to continuing to work with agencies statewide to develop and implement a reasonable and enforceable plan that will successfully reduce statewide gallons per capita per day (gpcd).

It is fitting to assign the Department of Water Resources (DWR) to be the lead agency in implementing the proposed 20x2020 Water Conservation Plan. Through the collection and review of integrated regional and urban water management plans, DWR has access to supplier level tools and analyses that have been provided on a management area basis within each hydrologic region. MWA has been using an integrated regional management plan (IRWMP) to reduce per capita use within our service area and shows substantial progress toward gpcd reduction since 2000, which was the originally established baseline year by this plan, rather than 2005 as proposed in the latest draft upon which this comment is being made.

Through data collection on supplier level production and measurable conservation methods within a management area, agencies can cooperatively achieve significant gpcd reduction through locally established programs, methods and regulations. Using the Public Water Systems Survey (PWSS) and Urban Water Management Plan (UWMP)/ IRWMP data for measuring and reporting gpcd data is appropriate and should provide an adequate level of regional coverage to incorporate the majority of urban users throughout the state. This bottoms-up approach to determining both baselines and targets is most appropriate to adequately and effectively reduce statewide gpcd. MWA has combined supplier-level production data with conservation savings data over the last nine years, producing results that indicate a reduction up to 23% region-wide since 2000.

Based on these encouraging results, MWA recommends that more discrete datasets on a management plan area level be used for baseline determination and to accurately and equitably establish targets for gpcd reduction. This plan emphasizes and recommends implementation of state mandated gpcd reduction to targets that have been determined from coarse datasets, as identified in the document and Appendix B. Including IRWMP/UWMP area analyses, regional acceptance process area methods (as defined by DWR) and local physical characteristics like climate and ET rates is more equitable

and provides an achievable result; and, all of this information is commonly defined on the management area level.

A statewide reduction target of 154 gpcd is not representative of the same quality of life from one hydrologic region to the next. This is extremely evident in the area of outdoor landscaping, which, as identified in this proposed plan, is clearly the best and most effective means for reducing per capita water use. For example, a household with 154 gpcd in coastal and/or moist areas cannot be compared to properties in arid, desert areas with the same gpcd. (See attached pictures that show a typical neighborhood and home in Region 10-Yucca Valley [142 gpcd actual with a 346 gpcd baseline] in comparison to a typical neighborhood and home in Region 4-Anaheim [188 gpcd actual with a 180 gpcd baseline]). How can a typical home in Hydrologic Regions 1-4, while irrigating large turf areas, be classified as having met or gone below the state-wide target through conservation and use reduction methods, therefore not having to reduce their gpcd? The attached pictures clearly show that there are areas in other Hydrologic Regions statewide where water use could be sharply reduced through outdoor landscaping changes alone where no additional gpcd reduction will be required through this proposed plan.

This is the primary reason that MWA incentivizes and promotes turf removal and its replacement with desert-adaptive and less water intensive landscaping at a cost of less than \$10 per participating connection. Yet this important tool for water use reduction has not been adequately addressed in the proposed plan. Households in arid areas with minimal turf areas and water-efficient irrigation methods may use as much water as households in moister climates with large, irrigated turf areas. Therefore, it is inequitable for home and business owners in more arid Hydrologic Regions to make major lifestyle changes to meet statewide targets, while residents and businesses in other areas do not.

MWA will continue to aggressively and cooperatively pursue regionally appropriate measures to continue our steady reduction of water use in both Hydrologic Regions 9 and 10. We support a statewide methodology to reduction targets, but disagree that a top-down, Hydrologic Region approach is appropriate for setting baselines and targets. Turf removal incentives, water-efficient landscaping requirements on new construction, retrofit ordinances on resale and regional management area level approaches to outreach and education have been and continue to be the most effective tools for reducing gpcd statewide and should be considered effective in all areas of the state.



Region 10 (Yucca Valley): 142 GPCD in 2007



Region 4 (Anaheim) Baseline: 180 GPCD